

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

R.A. JR. (a minor child, by and through his  
Father and next friend, Richard Lemmel  
Arnold,

Plaintiff,

vs.

DEPUTY SHERIFF WALTER LACEY,  
in his official and individual capacity,

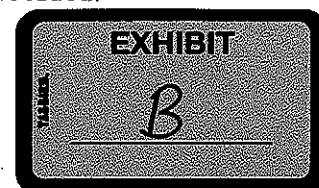
Defendant.

Case No.: CV-3:06-cv-337-WHA

**DEFENDANT'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS TO PLAINTIFF**

COMES NOW the Defendant and pursuant to Rule 34 of the Federal Rules of Civil Procedure request the Plaintiff to produce at the offices of Ball, Ball, Matthews & Novak, P.A., 2000 Interstate Park Drive, P. O. Box 2148, Montgomery, AL 36102-2148 the following documents:

1. A true and correct copy of any and all transcripts of tape recorded conversations with any of the past or current agents, servants, or employees of Macon County and/or Macon County Sheriff.
2. All photographs and video tapes of the injuries to the Plaintiff, including, but not limited to the photographs taken of R.A., Jr. at the Tallassee Community Hospital.
3. Copies of any and all statements previously made by the past or current agents, servants, or employees of Macon County and/or Macon County Sheriff concerning the subject matter of this lawsuit, including any written statements, signed or otherwise, and any stenographic, mechanical, electrical or other type of recording or transcription contemporaneously recorded.



4. A copy of any and all photographs, videotapes, drawings, maps, sketches of the scene of the subject scene.

5. Copies of all applications made by the plaintiff, R.A., Jr., for any alleged disability or medical benefits with any insurer, with any state, federal or governmental agency, and all schedules, exhibits or attachments made a part of any application or claim for any alleged disability or medical benefits.

6. All medical records of the plaintiff, R.A., Jr., including all histories, summaries, diagnoses, and opinion letters from January 1, 2000 to present, relating to any treatment or medical advice received by the plaintiff, whether related to the injury made the basis of the plaintiff's complaint or otherwise.

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7. All drug bills and other bills whether received from doctors or other persons relating to any expense or damage allegedly claimed by the plaintiff as a result of the matters made the basis of this action.

8. Copies of any and all tax returns, both federal and state, prepared by or on behalf of the plaintiff, Richard Lemmell Arnold, during the last five (5) years.

9. Any and all policies and certificates of insurance covering the plaintiff during the last five (5) years.

10. All documents which support your claim of damages arising out of the incident which is the subject of this lawsuit.

11. Please provide all documents relating to any benefits of any kind the plaintiff has received as a result of this occurrence, including, but not limited to, all documentation of collateral source payments, discounts, write-downs, write-offs, deductions, co-payments, and deductibles identified in the answer to Interrogatory No.: 6.

  
C. WINSTON SHEEHAN, JR.  
Attorney for the Defendant, Walter Lacey

OF COUNSEL:

BALL, BALL, MATTHEWS & NOVAK, P.A.  
2000 Interstate Park Drive, Suite 204  
Post Office Box 2148  
Montgomery, Alabama 36102-2148  
Phone: (334) 387-7680  
Fax: (334) 387-3222

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on the following counsel of record:

Hon. Arlene M. Richardson  
Richardson Legal Center, LLC  
Post Office Box 971  
Hayneville, AL 36040-0971

by telefax and by placing same in the U.S. mail postage prepaid on this the 20<sup>TH</sup> day of February, 2007.

  
OF COUNSEL